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By ECF

Hon. Kiyo Matsumoto
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: Innovation Ventures, et al. v. Ultimate One Distributing Corp., et al. 12
Civ. 5354 (EDNY) (KAM) (RLM)**

Dear Judge Matsumoto:

On behalf of Plaintiffs Living Essentials, LLC, Innovation Ventures, LLC, and International IP Holdings, LLC (collectively, "Living Essentials"), we write in response to the March 11 letter filed on behalf of Defendant Valero Retail Holdings, Inc. ("VRH") seeking a pre-motion conference in connection with a motion to dismiss. Counsel for both parties have conferred on the issues raised in the letter and Living Essentials has agreed to voluntarily dismiss several of the causes of action alleged against VRH in its Seventh Amended Complaint. In response, VRH has agreed to withdraw its request for a pre-motion conference.

Respectfully submitted,



Geoffrey Potter

cc: All counsel (via ECF)